

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

C.S.,

Plaintiff,

v.

MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES LTD, a foreign entity;
MINDGEEK USA INCORPORATED, a
Delaware corporation; MG PREMIUM
LTD, a foreign entity; MG GLOBAL
ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC, INC.,
a foreign entity; BERND BERGMAIR, a
foreign individual; FERAS ANTOON, a
foreign individual; DAVID TASSILLO,
a foreign individual; VISA INC., a
Delaware corporation; REDWOOD
CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
REDWOOD DOE FUNDS 1-7;
COLBECK CAPITAL
MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
DOE FUNDS 1-3,

Defendants.

Case No. 2:24-cv-04992-WLH-ADS

**[PROPOSED] ORDER
GRANTING JOINT
STIPULATION RE BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTIONS TO DISMISS**

1 On August 9, 2024 Defendants MindGeek S.à r.l., MG Freesites Ltd,
2 MindGeek USA Incorporated, MG Premium Ltd, MG Global Entertainment Inc.,
3 9219-1568 Quebec Inc., Bernd Bergmair, Feras Antoon, David Tassillo, Visa Inc.,
4 Redwood Capital Management, LLC, and Colbeck Capital Management, LLC
5 (collectively, “Defendants”) and Plaintiff C.S. (“Plaintiff”) (collectively with
6 Defendants, the “Parties”), filed a Joint Stipulation Regarding Briefing Schedule for
7 Defendants’ Motions to Dismiss (the “Joint Stipulation”).

8 Pursuant to the Joint Stipulation, the Parties stipulate and agree to additional
9 time for Defendants to answer, move, or otherwise respond to Plaintiff’s Complaint
10 (ECF No. 1, hereinafter referred to as the “Complaint”), to set a briefing schedule in
11 the event one or more motions is filed, and to set enlarged page limitations relating
12 to any such briefing.

13 The Court, having considered the Parties’ Joint Stipulation, and finding good
14 cause therefor, hereby GRANTS the Stipulation and ORDERS as follows:

15 1. Defendants’ deadline to answer, move or otherwise respond to the
16 Complaint shall be **October 15, 2024**;

17 2. In the event that any Defendant moves to dismiss the Complaint or files any
18 other motions relating to the Complaint, the following deadlines shall apply for
19 corresponding Opposition and Reply Briefs:

20 **November 22, 2024:** Plaintiff’s Deadline to Respond to Each Defendant’s
21 Motion (if and as applicable);

22 **December 13, 2024:** Each Defendant’s Deadline to File Replies (if and as
23 applicable);

24 **January 10, 2025:** Proposed Hearing on Each Defendant’s Motion (if
25 and as applicable.

26 3. The page limit for each motion in response to the Complaint is increased to
27 forty (40) pages or less.
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1 4. Defendants preserve all objections and defenses to the Complaint, including
2 all objections and defenses on the ground of lack of personal jurisdiction.

3 IT IS SO ORDERED.

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5 DATED:

By: _____

6 HON. WESLEY L. HSU

7 UNITED STATES DISTRICT JUDGE
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